

KHALE J. LENHART, #7-4693
TYSON R. WOODFORD, #8-6650

Hirst Applegate, LLP
P. O. Box 1083
Cheyenne, WY 82003-1083
Phone: (307) 632-0541
Fax: (307) 632-4999
klenhart@hirstapplegate.com
twoodford@hirstapplegate.com

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

BCB CHEYENNE LLC d/b/a BISON
BLOCKCHAIN, a Wyoming limited
liability company,

Plaintiff,

vs.

Civil No. 23-CV-79J

MINEONE WYOMING DATA CENTER
LLC, a Delaware limited liability company;
MINEONE PARTNERS LLC, a Delaware
limited liability company; TERRA
CRYPTO INC., a Delaware corporation;
BIT ORIGIN, LTD., a Cayman Island
Company; SONICHASH LLC, a Delaware
limited liability company; BITMAIN
TECHNOLOGIES HOLDING COMPANY,
a Cayman Island Company; BITMAIN
TECHNOLOGIES GEORGIA LIMITED, a
Georgia corporation; and JOHN DOES
1-18, related persons and companies who
control or direct some or all of the named
Defendants,

Defendants.

***MOTION TO SET ASIDE ENTRY OF DEFAULT AGAINST
DEFENDANT BITMAIN TECHNOLOGIES GEORGIA LIMITED***

Defendant Bitmain Technologies Georgia Limited (“Bitmain Georgia”), pursuant to Rule 55(c) of the Federal Rules of Civil Procedure, hereby moves this Court for an Order Setting Aside the *Entry of Default Against Defendant Bitmain Technologies Georgia Limited* (“*Entry of Default*”) filed herein on November 17, 2023. Dismissal is appropriate for the reasons set forth in the *Memorandum in Support of Motion to Set Aside Entry of Default Against Defendant Bitmain Technologies Georgia Limited* (“*Memorandum in Support*”), filed contemporaneously herewith.

Furthermore, pursuant to U.S.D.C.L.R. 7.1(b)(1)(A), counsel certifies that it has conferred with opposing counsel and that opposing counsel opposes the *Motion to Set Aside Entry of Default Against Defendant Bitmain Technologies Georgia Limited*. The specific efforts undertaken to confer with opposing counsel are set forth in the “Relevant Facts” section of the *Memorandum in Support*.

WHEREFORE, Defendant Bitmain Georgia respectfully requests the Court find good cause to grant the *Motion to Set Aside Entry of Default Against Bitmain Technologies Georgia Limited* and allow Bitmain to defend this matter on its merits.

Dated: 13 December 2023.

BITMAIN TECHNOLOGIES GEORGIA
LIMITED, Defendant

BY: s/Khale J. Lenhart

KHALE J. LENHART, #7-4693
TYSON R. WOODFORD, #8-6650
OF HIRST APPLGATE, LLP
Attorneys for Defendant Bitmain Georgia
P. O. Box 1083
Cheyenne, WY 82003-1083
Phone: (307) 632-0541
Fax: (307) 632-4999
klenhart@hirstapplegate.com
twoodford@hirstapplegate.com

CERTIFICATE OF SERVICE

I certify the foregoing ***Motion to Set Aside Entry of Default Against Defendant Bitmain Technologies Georgia Limited*** was served upon all parties to this action pursuant to the Federal Rules of Civil Procedure on 13 December 2023, and that copies were served as follows:

Patrick J. Murphy, #5-1779
Scott C. Murray, #7-4896
Williams, Porter, Day & Neville, P.C.
159 North Wolcott, Suite 400
P. O. Box 10700
Casper, WY 82602-3902
pmurphy@wpdn.net
smurray@wpdn.net
Attorneys for Plaintiff

☐ U.S. MAIL
☐ FED EX
☐ FAX
☐ HAND DELIVERED
☐ EMAIL
☒ E-FILE

Sean M. Larson, #7-5112
Kari Ann Hartman, #8-6507
Hathaway & Kunz, LLP
P. O. Box 1208
Cheyenne, WY 82003-1208
slarson@hkwyolaw.com
khartman@hkwyolaw.com
*Attorneys for Defendants Mineone, Terra Crypto, Bit
Origin, Sonichash*

☐ U.S. MAIL
☐ FED EX
☐ FAX
☐ HAND DELIVERED
☐ EMAIL
☒ E-FILE

Paula Colbath, *Pro Hac Vice*
Sarah Levitan Perry, *Pro Hac Vice*
Loeb & Loeb, LLP
345 Park Avenue
New York, NY 10154
pcolbath@loeb.com
sperry@loeb.com
*Attorneys for Defendants Mineone, Terra Crypto, Bit
Origin, Sonichash*

☐ U.S. MAIL
☐ FED EX
☐ FAX
☐ HAND DELIVERED
☐ EMAIL
☒ E-FILE

s/Norma J. Hubka
OF HIRST APPLGATE, LLP
Attorneys for Defendant Bitmain Georgia